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7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 LV RESTORATION & PLUMBING, INC., a
Nevada corporation,

10 Plaintiff,

11 vs.

12 LAS VEGAS RESTORATION LLC, a Nevada
limited liability company;
13 ARPINEH EBRAHIMIAN, an individual;
ARMEN HARUTYUNYAN, an individual;
14 NUBAR LUSIKYAN, an individual; and
LILIT TER BARSEGHYAN, an individual;

15 Defendants.

Case No. 2:20-cv-00531-GMN-EJY

**STIPULATION AND PROPOSED
ORDER TO EXTEND TIME FOR
DEFENDANTS TO RESPOND TO
COMPLAINT**

(FIRST REQUEST)

17 Plaintiff, LV Restoration & Plumbing, Inc. ("Plaintiff") on the one hand, and Las Vegas
18 Restoration LLC, Arpineh Ebrahimian, Armen Harutyunyan, Nubar Lusikyan, and Lilit Ter
19 Barseghyan (collectively, the "Defendants") on the other hand, hereby stipulate and agree:

20 WHEREAS, the Plaintiff filed its Complaint in the Eighth Judicial District Court in Clark
21 County, Nevada on February 13, 2020, case no. A-20-810480-C;

22 WHEREAS, the Defendants were all served with Summonses and the Complaint on
23 February 26, 2020;

24 WHEREAS, prior to filing an answer or other response to the Complaint in state court, all
25 Defendants joined in removing the case to federal court on March 13, 2020;

26 WHEREAS, Fed. R. Civ. Proc. 81 provides that after removal, a defendant who has not yet
27 filed an answer before removal must answer or otherwise respond to the complaint within the longer
28

1 of: (B) 21 days after being served with the summons for an initial pleading on file at the time
2 of service; or (C) 7 days after the notice of removal is filed. Fed. R. Civ. Proc. 81(c)(2)(B), (C);

3 WHEREAS, on information and belief, Defendants' answer or response to the complaint is
4 therefore due by Friday, March 20, 2020;

5 WHEREAS, undersigned counsel for the Defendants was just retained as counsel on March
6 13, 2020, the parties stipulate and agree, subject to Court approval, that Defendants' deadline to
7 file their response to the Complaint shall be extended to April 3, 2020; and

8 WHEREAS, this is the parties' first stipulation to extend this deadline,

9 The parties respectfully stipulate, agree, and request that the Court grant this stipulation.

10 Dated March 18, 2020.

Dated March 18, 2020.

11 THE MEDRALA LAW FIRM, PROF. LLC

LYNCH LAW PRACTICE, PLLC

12 /s/ Jakub P. Medrala

/s/ Michael F. Lynch

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21 **IT IS SO ORDERED.**

22 
23 DAYNA J. ZOUCAL
UNITED STATES MAGISTRATE JUDGE

24 Dated: March 19, 2020